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9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 JASON MATTHEW ROMERO,

15 Defendant.

Case No. 2:13-cr-00339-GMN-PAL

16 **STIPULATION TO CONTINUE REPLY
DEADLINE TO THE GOVERNMENT'S
RESPONSE TO DEFENDANT'S
MOTION FOR COMPASSIONATE
RELEASE**
(First Request)

17 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,
18 United States Attorney, and Adam Flake, Assistant United States Attorney, counsel for the
19 United States of America, and Rene L. Valladares, Federal Public Defender, and Cristen C.
20 Thayer, Assistant Federal Public Defender, counsel for Jason Matthew Romero, request that
21 the due date for Mr. Romero's Reply to the Government's Response to Defendant's Motion
22 for Compassionate Release (ECF No. 90), be extended fourteen (14) days from July 5, 2022,
23 to July 19, 2022.

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This Stipulation is entered into for the following reasons:

1. The Bureau of Prisons has been unable to schedule a legal call between defense counsel and Mr. Romero. Therefore, defense counsel requires more time to consult with Mr. Romero before filing a reply.

2. The parties agree to the continuance.

3. Mr. Romero does not object to the continuance.

4. The additional time requested by the stipulation is made in good faith and not for purposes of delay.

This is the first request for a continuance of the reply's deadline.

DATED this 5th day of July 2022.

RENE L. VALLADARES
Federal Public Defender

JASON M. FRIERSON
United States Attorney

By /s/ Cristen C. Thayer
CRISTEN C. THAYER
Assistant Federal Public Defender

By /s/ Adam Flake
ADAM FLAKE
Assistant United States Attorney

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,
Plaintiff,
v.
JASON MATTHEW ROMERO,
Defendant.

Case No. 2:13-cr-00339-GMN-PAL
ORDER

IT IS THEREFORE ORDERED that upon consideration of Defendant's Request to Extend Deadline for Filing his Reply to Government's Response to Motion for Compassionate Release, that the Defendant's Deadline to file his Reply is extended to July 19, 2022.

DATED this 5 day of July 2022.

Gloria M. Navarro, District Judge
UNITED STATES DISTRICT COURT